

6EN-HT

MEMORANDUM

DATE: May 03, 2001

SUBJECT: RCRA Compliance Inspection

FROM: Mike Michaud, Chief  
Surveillance Section (6EN-AS)

TO: Mark Potts, Chief  
Hazardous Waste Enforcement Branch (6EN-H)

The attached RCRA inspection report has been prepared and reviewed by Compliance Assurance and Enforcement Division personnel. This report is being forwarded to you for your information and action.

Inspection dates: April 9&10, 2001 EPA ID Nos. TXD039045968  
Name of Facility: Fairchild Aircraft, Inc.  
Facility Mailing Address: P.O. Box 790490  
San Antonio, Texas 78284

Facility Owner: Fairchild Aircraft Inc. Telephone: 210/824-9421  
Description of Facility: Manufactures Aircraft Parts & Wings  
Type of Ownership: Federal State County Municipal ☒ Private

Did facility request a copy of the report: ☒ Yes ☐ No

HW Activities: ☒ Generator ☐ Transporter ☐ Treatment  
☐ Disposal ☒ Storage (<90 day)

Type of Inspection: ☒ Lead ☐ Overview ☒ CEI ☐ PSMS Commitment  
☐ CME ☐ Land Ban ☐ MM ☐ BIF

INSPECTION PARTICIPANTS: (name and phone number)

EPA Inspector(s): Ken Cooper (214) 665-8047

State Inspector(s): NONE

Facility Representative(s): Brad Morton - EHS Administrator and  
Paul Granato - VP, Human Resources (210) 824-9421

Comments: Please see the attached narrative report for information  
about the investigation, including the areas discussed during the  
out briefing conference.

Inspector Signature: Ken Cooper Date: 5-3-01

Reviewer Signature: [Signature] Date: 5-3-01

EPA REGION 6  
DALLAS SURVEILLANCE TEAM  
RCRA INSPECTION REPORT

INSPECTION DATE: April 9 & 10, 2001

FACILITY NAME: Fairchild Dornier (formerly Fairchild Aircraft, Inc.)

PARENT COMPANY: Fairchild Dornier Inc.

PHYSICAL ADDRESS: 10823 NE Entrance Road  
San Antonio, Texas

TYPE OF INDUSTRY: SIC Code 3728

EPA ID NUMBER : TXD039045968

COMPANY PERSONNEL:

Name	Title	Phone
Brad Morton	E. H. & S. Administrator	210/824-9421
Paul Granato	V.P.- Human Resources	210/824-9421

FEDERAL & STATE REGULATORY PERSONNEL:

Name	Title	Agency	Phone
Ken Cooper	Environmental Scientist	EPA, Region 6	214/665-8047

INTRODUCTION

An RCRA compliance evaluation inspection was conducted at the Fairchild Dornier (Fairchild) facility complex in San Antonio, Texas on April 9 & 10, 2000. The company complex, which is adjacent to the San Antonio airport, was not notified of the inspection prior to arrival. At the time of the RCRA inspection, Fairchild was in operation and was conducting manufacturing, metal finishing, and maintenance activities.

Fairchild has been in business at 10823 NE Entrance Road in San Antonio, Texas since the 1960's. Fairchild manufactures aircraft parts, assembles wings for commuter aircraft, and also performs some aircraft maintenance work at their San Antonio complex (see Attachment A for a map of the Fairchild facilities). According to Mr. Morton, Fairchild actually has four different companies that work on-site. The four companies are Fairchild Dornier, Fairchild Aircraft Services, Fairchild Government



Programs, and Fairchild Aircraft Inc. Reportedly, about 300 people are employed by the four Fairchild companies. During the inspection, I talked with Brad Morton, the EHS Administrator. According to Mr. Morton, who handles the environmental, health, and safety related activities for Fairchild, these facilities specialize in the manufacture and construction of aircraft parts and wing assemblies. The wing assemblies may also be dye tested and painted before they are shipped in special containers to Metro and Dornier aircraft manufacturing plants in Germany. This facility complex operates as a large quantity hazardous waste generator, due to the significant amounts of paints, strippers, sealants, and solvents that are used. The Fairchild companies store their hazardous wastes in containers in a central hazardous waste storage area, prior to shipment to commercial waste disposal facilities. Fairchild also has about 20 hazardous waste satellite accumulation areas scattered throughout their San Antonio manufacturing complex. According to Fairchild's records, the company shipped off approximately 35 to 40,000 pounds of hazardous wastes for disposal last year.

#### **FACILITY INSPECTION AND OBSERVATIONS**

I arrived at Fairchild complex on the morning of April 9, 2001 and met Brad Morton, the EHS Administrator and Paul Granato, the VP of Human Resources. I informed Messrs Morton and Granato that EPA had scheduled Fairchild for both RCRA and NESHAPS - Chromium compliance evaluation inspections. We discussed the areas that EPA inspections normally cover and the information that would be needed to complete the inspections. We began the RCRA inspection by discussing the types of work that were performed and the hazardous wastes that were generated at Fairchild's San Antonio operations. According to Mr. Morton, the facility's main activities were the manufacture of aircraft parts and the construction of aircraft wings for commuter type aircraft (Metro 23 and Dornier 328 aircraft). These planes are built to carry 20 to 35 passengers. Hazardous waste records indicated that Fairchild's manufacturing operations routinely generated approximately 3,000 pounds of hazardous wastes per month during the year of 2000. At the time of the inspection, most of the hazardous wastes being generated were paint wastes, spent solvents, paint removers, sealants, contaminated fuels, and wastewater treatment sludge (see Attachments #1 and #2). The hazardous wastes were being stored in waste containers in the company's centralized waste consolidation/storage area. Fairchild also generates significant amounts waste "penetrating dye", a toxic but non-hazardous industrial waste. The penetrating dyes are used to check for metal fractures and structural integrity.



After our discussions, we decided to take a tour of the Fairchild complex, in order to observe the facilities and the operating conditions. Mr. Morton accompanied me on a tour of the aircraft parts manufacturing, coating, testing and assembly areas. We concentrated the processes that generate wastes, the hazardous waste satellite accumulation areas, and the storage areas. Mr. Morton provided a description of the various manufacturing processes while we toured the facility. He also showed me how the process wastewater and wash waters were being treated before they were discharged to the City of San Antonio wastewater collection system. One area of particular interest that we inspected was the centralized hazardous waste handling and consolidation area near Building #130. According to Mr. Morton, the company's hazardous wastes are normally consolidated into waste storage containers, which are stored inside the enclosed container storage building. However, at the time of the inspection, Fairchild had filled up their container building and was also storing some of the hazardous waste containers in the waste consolidation area. When we inspected the hazardous waste consolidation/storage area, we observed three open hazardous waste containers in the area, which held paint wastes. One gray 55 gallon accumulation container of liquid paint wastes had an open funnel in the top and was not labeled as a hazardous waste container (only the original "Soltrol 130" label was visible - see attached photo #1). The second open container was a black 55 gallon drum with an open bung hole on the backside, which was labeled as liquid paint wastes and was dated 12-30-00 (see attached photo #3). The third open container was a black 55 gallon container of used paint filters (see the open labeled hazardous waste container on the right side of photo #4). Also visible in photo #4 is a pile of several used paint filters that had not been placed inside a hazardous waste container. In addition, two of the hazardous waste containers in the consolidation area were dated with dates that had exceeded the 90 day facility storage limit (the black container in photo #3 was dated 12-3-00 and the gray container in photo #2 was dated 12-10-00). After checking the waste consolidation area, we inspected the hazardous waste container storage building. The container storage building was full of hazardous waste containers that were labeled and dated, except for one gray container of liquid paint wastes that was just inside the building's entrance door (see attached photo # 5).

Next, we inspected waste generation areas and satellite accumulation areas in the manufacturing buildings and aircraft hangers. Several satellite accumulation areas were checked and all waste accumulation containers were labeled as required. However, I observed that some of the satellite accumulation containers in Hanger # 11 were open top drums (see attached photo



#6 as an example). These open top satellite accumulation containers mostly held solid paint wastes (an accumulation of cloths, wipes, and paper that were contaminated with paints, solvents, and sealers). After the plant tour, we discussed the RCRA regulatory requirements for large quantity hazardous waste generators which operate as <90 day storage facilities.

On 4-10-01, I returned to the Fairchild facility and continued the RCRA inspection. Mr. Morton and I reviewed the company's waste generation records, hazardous waste manifests, emergency response/contingency plan, training records, and other RCRA related records (see Attachment #3 for a copy of a recent hazardous waste shipping manifest). The company's emergency response/contingency plan was originally written in March of 1996. I recommended that the plan be updated and I provided Mr. Morton with information about the specific requirements for contingency plans. When I asked Mr. Morton for the company's container storage area inspection records, he was only able to provide inspection records for March 19 through April 9, 2001 (see Attachment #4 for an example of the inspection records). According to Mr. Morton, he was not aware of any other written container storage area inspection records, prior to March 2001.

During the morning, I also visited the site of a recent "Jet A" fuel spill, which Fairchild was in the process of cleaning up (see attached photo #7). Mr. Morton said approximately 50 gallons of Jet A were spilled when a fuel line disconnected. The spill occurred on April 3, 2001. At the time of the inspection, Fairchild already had two roll off boxes full of contaminated soil and had requested two additional roll off boxes from their supplier. More soil will be removed after the additional roll off boxes arrive. According to Mr. Morton, no samples had been collected from the fuel spill area at the time of the inspection. I asked him to send copies of the sampling results from the fuel spill area to me, as soon as the area was sampled and the results became available.

At the request of Mr. Morton, I revisited the Fairchild's waste consolidation and storage areas. Most of the areas of concern that I observed on the previous day had been corrected. No open waste containers were observed. All of the hazardous waste containers had been labeled and dated, as required. The waste consolidation area had been cleaned up and all of the paint filter wastes had been placed into hazardous waste containers. After the wastes had been consolidated Fairchild had a total of 16 containers of hazardous wastes and 1 satellite accumulation container of liquid paint wastes. Since the container storage building would not hold all of the waste containers, some of these containers were being stored in the waste consolidation



area, until a hazardous waste shipment could be scheduled.

#### EXIT INTERVIEW

Ken Cooper conducted an brief exit interview with Mr. Morton and Mr. Granato before leaving the facility. We discussed the areas of concern that were discovered during the inspection. The areas of concern are listed below. I reminded Mr. Morton that I had asked him to send me results of the sampling data from the fuel spill area, as soon as that data became available. Before leaving, we discussed EPA enforcement procedures and I provided Mr. Morton with a copy of EPA's information sheet for "Small Business Resources".

#### AREAS OF CONCERN

At the time of the inspection, several areas of concern were noted by the inspector and these areas of concern were later discussed with the facility representatives. The areas of concern are listed as follows.

1. Two open hazardous waste containers of paint waste liquids and one open hazardous waste container of paint waste solids were observed in the waste consolidation area (see attached photos #1, #3, & #4). Also, more than one open satellite accumulation container of paint waste solids was observed in Hanger #11 (see attached photo #6). Based on the company's NOR, paint waste liquids have hazardous waste codes D001, D006, D007, D008, D010, D035, F003, & F005. Paint waste solids have hazardous waste codes D006, D007, D008, D010, D035, F003, & F005 wastes.
2. One hazardous waste accumulation container of paint waste liquids was observed in the waste consolidation area, which was not labeled as hazardous waste or identified according contents in the container (see attached photo #1). According to Mr. Morton, the container was about half full of paint waste liquids.
3. Paint filters (paint waste solids) were observed laying in the waste consolidation area, which were not being stored inside hazardous waste containers.
4. One container of liquid paint waste (LPW) was observed which was dated 12-30-00 and one container of solid paint waste (SPW) was observed which was dated 12-10-00. Both of these hazardous waste containers had exceeded the facility's <90 day storage limit (see attached photos #2 and #3).
5. One hazardous waste container of paint waste liquids was observed in the hazardous waste container storage building, which

had not been dated (see attached photo #5).

21 6. No container area inspection records were available for the time prior to March 2001.

22 7. The emergency preparedness/contingency plan needed to be updated. No notification letter were available to document that the fire department, police department, or hospitals had been notified.

8. Fairchild was in the process of cleaning up a fuel spill (of Jet A) at the time of the inspection. No sampling had been done to characterize the contaminated soils which were being removed. Mr. Morton said that samples would be promptly collected and that he would send copies of the analytical data, as soon as it became available. The data had not been received by the time this report was written.

Ken Cooper